



PETER H. LEVITT
PARTNER
Shutts & Bowen LLP
200 South Biscayne Boulevard
Suite 4100
Miami, Florida 33131
DIRECT (305) 415-9447
FAX (305) 415-9847
EMAIL plevitt@shutts.com

June 29, 2017

VIA ECF

United States District Court (Part I)
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Australia and New Zealand Banking Group Limited v. APR Energy Holding Limited* (Case No.: 1:17-mc-00216-P1) (Judge Part One)
Request for Enlargements of Time re Motion to Quash Subpoena

Your Honor:

We represent APR Energy Holdings Limited ("APR") in the above-captioned matter. APR applied for the issuance of a subpoena pursuant to 28 U.S.C. § 1782. *See* Case No. 14-mc-00143. The Court authorized the subpoena, and it was issued and served on Australia and New Zealand Banking Group Limited ("ANZ").

ANZ has filed a *Motion to Quash the Subpoena, or, for a Protective Order* (the "Motion to Quash") (Dkt. Nos. 1-5). Counsel for ANZ has kindly consented to a two-week enlargement of APR's time to respond to the Motion to Quash, so that APR's **response** will be due on **July 14, 2017**. APR has consented to an enlargement of ANZ's time to file a **reply**, until **July 21, 2017**.

The undersigned respectfully requests that the Court approve these enlargements of time.

This matter is an important and complex one, and APR requires the additional time to prepare a thorough and adequate response to the Motion to Quash and supporting Declarations. The additional time is also needed due to undersigned counsel's schedule and work load. Your Honor's consideration of this matter is greatly appreciated.

Respectfully submitted,

s/ Peter H. Levitt

Peter H. Levitt

cc (email): Adam Samuel Lurie (adam.lurie@linklaters.com)
James Robert Warnot, Jr. (james.warnot@linklaters.com)
Aaron Javian (aaron.javian@linklaters.com)